

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JOAQUIN ORELLANA CASTANEDA and
GERMAN HERNANDEZ ARGUETA,
on behalf of themselves and all others similarly
situated

Plaintiffs-Petitioners,

Docket No. CV-17-4267
(Bianco, J.)
(Lindsay, M.J.)

v.

U.S. DEPARTMENT OF HOMELAND SECURITY,
et al.,

Defendants-Respondents.
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Joseph A. Marutollo, an attorney duly admitted to practice in the Eastern District of New York, declares pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am an Assistant United States Attorney, of counsel to Bridget M. Rohde, Acting United States Attorney, Eastern District of New York, attorney for Federal Defendants. I am familiar with the facts in the instant case.
2. Attached hereto as Exhibit A is a true and correct copy of the Suffolk County Police Department April 23, 2017 Arrest Report for Joaquin Orellana Castaneda.
3. Attached hereto as Exhibit B is a true and correct copy of the Suffolk County Sheriff's Office April 24, 2017 Bail and Fine Receipt for Joaquin Orellana Castaneda.
4. Attached hereto as Exhibit C is a true and correct copy of the Suffolk County Court Order to Remand and Produce Joaquin Orellana Castaneda for a Court Appearance.

5. Attached hereto as Exhibit D is a true and correct copy of the Department of Homeland Security's Immigration Detainer-Notice for Joaquin Orellana Castaneda.

6. Attached hereto as Exhibit E is a true and correct copy of the Department of Homeland Security's Warrant for Arrest of Alien for Joaquin Orellana Castaneda.

7. Attached hereto as Exhibit F is a true and correct copy of the Department of Homeland Security's Notice to Appear for Joaquin Orellana Castaneda.

8. Attached hereto as Exhibit G is a true and correct copy of the Suffolk County Notice of Custody for Joaquin Orellana Castaneda.

9. Attached hereto as Exhibit H is a true and correct copy of the Suffolk County Discharge Notification for Joaquin Orellana Castaneda.

10. Attached hereto as Exhibit I is a true and correct copy of the Department of Homeland Security's Notice of Custody Determination for Joaquin Orellana Castaneda.

11. Attached hereto as Exhibit J is a true and correct copy of the Immigration Judge's denial of Joaquin Orellana Castaneda's request for bond.

12. Attached hereto as Exhibit K is a true and correct copy of Joaquin Orellana Castaneda's brief in support of his motion to terminate proceedings in his immigration removal proceedings (exhibits omitted).

13. Attached hereto as Exhibit L is a true and correct copy of the Immigration Judge's order denying Joaquin Orellana Castaneda's motion and order of removal.

14. Attached hereto as Exhibit M is a true and correct copy of the August 18, 2017 transcript in *People of the State of New York v. German Hernandez Argueta*.

15. Attached hereto as Exhibit N is a true and correct copy of the Department of Homeland Security's Notice to Appear for German Hernandez Argueta.

16. Attached hereto as Exhibit O is a true and correct copy of the Suffolk County Police Department's July 2, 2017 Arrest Report for German Hernandez Argueta.

17. Attached hereto as Exhibit P is a true and correct copy of the Suffolk County Court Order to Remand and Produce German Hernandez Argueta for Court Appearances.

18. Attached hereto as Exhibit Q is a true and correct copy of the Department of Homeland Security's Immigration Detainer-Notice for German Hernandez Argueta.

19. Attached hereto as Exhibit R is a true and correct copy of the Department of Homeland Security's Warrant for Arrest of Alien for German Hernandez Argueta.

20. Attached hereto as Exhibit S is a true and correct copy of the Suffolk County Discharge Notification for German Hernandez Argueta.

21. Attached hereto as Exhibit T is a true and correct copy of the Immigration Judge's order regarding German Hernandez Argueta's request for bond.

22. Attached hereto as Exhibit U is a true and correct copy of the Suffolk County Police Department's June 2, 2017 Arrest Report for German Hernandez Argueta.

23. Attached hereto as Exhibit V is a true and correct copy of the Suffolk County Court Order to Remand and Produce German Hernandez Argueta for Court Appearance in connection with his June 2, 2017 arrest.

Dated: Brooklyn, New York
November 9, 2017

BRIDGET M. ROHDE
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By:


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